

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(BALTIMORE DIVISION)**

JABARI LYLES, on behalf of himself and all
others similarly situated,

Plaintiff,

v.

CHEGG, INC.,

Defendant.

Case No.: 1:19-cv-03235-RDB

Judge Richard D. Bennett

**STATEMENT BY CHEGG, INC.
CONCERNING REMOVAL**

Pursuant to the Court's Standing Order Concerning Removal entered November 12, 2019, Chegg, Inc. ("Chegg") states that:

1. The Affidavit of Service of Class Action Complaint that plaintiff filed in state court states that Chegg, the sole defendant in this action and in the state court action, was served with the summons and complaint on October 11, 2019. Chegg does not dispute this statement.

2. Chegg is a corporation and is not a citizen of Maryland for purposes of diversity jurisdiction, because Chegg is a Delaware corporation and has its principal place of business in California. *See* 28 U.S.C. § 1332(c)(1) ("a corporation shall be deemed to be a citizen of every State and foreign state by which it has been incorporated and of the State or foreign state where it has its principal place of business").

3. Chegg's notice of removal was not filed more than thirty days after first being served with a copy of the summons and complaint.

4. The state court action that is the subject of Chegg's notice of removal was not commenced more than one year before the date of removal.

5. There is no defendant who was served in the state court action prior to the time of removal but did not join in the notice of removal.

Dated: November 18, 2019

Respectfully submitted,

ORRICK, HERRINGTON & SUTCLIFFE LLP

/s/ David T. Cohen

David T. Cohen, Bar No. 811803

51 West 52nd Street

New York, NY 10019-6142

Telephone: +1 212 506 5000

david.cohen@orrick.com

Attorney for Defendant Chegg, Inc.

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically via CM/ECF on November 18, 2019 and has been served on all counsel who have consented to electronic service. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ David T. Cohen

David T. Cohen